

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

*Plaintiffs,*

v.

GREGORY W. ABBOTT, in his official capacity as Governor  
of Texas, et al.,

*Defendants.*

Consolidated Case No. 5:21-CV-  
0844-XR

**INITIAL DISCLOSURES OF DEFENDANT ISABEL LONGORIA, IN HER OFFICIAL  
CAPACITY AS THE HARRIS COUNTY ELECTIONS ADMINISTRATOR**

Defendant ISABEL LONGORIA, in her Official Capacity as the Harris County Elections Administrator (“Longoria”)<sup>1</sup> now serves her Initial Disclosures pursuant to Rule 26, Fed. R. Civ. P., and would respectfully show as follows:

- (1) The names and, if known, the address and telephone number of individuals likely to have discoverable information that may be used to support Defendant’s claims or defenses are as follows:

| Witness Name   | Contact Information | Relationship to Case/Subject area of Knowledge  |
|--|---------------------|---|
| Isabel Longoria, Harris County Elections Administrator | Contact via counsel | Knowledge of her claims and defenses. Knowledge regarding the administration of elections in Harris County. |

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<sup>1</sup> Isabel Longoria, in her Official Capacity as Harris County Elections Administrator, is named as a Defendant in cases 1:21-cv-780, 1:21-cv-786, and 5:21-cv-848, all of which were consolidated into this matter.

|   |   |  |
|---|---|--|
| Gregory W. Abbott,<br>Governor of Texas                             | Contact via counsel for<br>Gregory W. Abbott  | Knowledge related to the<br>related to the passage,<br>implementation, and<br>enforcement of SB 1  |
| Jose A. Esparza, Deputy<br>Secretary of State                       | Contact via counsel for Jose<br>Esparza   | Knowledge related to the<br>administration of elections in<br>Texas, and the passage,<br>implementation, and<br>enforcement of SB 1  |
| Warren Kenneth Paxton,<br>Attorney General of Texas                 | Contact via counsel for Ken<br>Paxton   | Knowledge related to the<br>enforcement of voting laws in<br>Texas, including provisions<br>of SB 1  |
| John Scott, Secretary of State                                      | Texas Secretary of State<br>P.O. Box 12887<br>Austin, TX 78711-2887<br>(512) 463-5650 | Secretary of State of Texas.<br>Knowledge related to the<br>implementation of SB 1.<br>Oversees certain<br>responsibilities related to<br>elections.                           |
| Keith Ingram, Director of<br>Elections, Texas Secretary of<br>State | P.O. Box 12060<br>Austin, TX 7811-2060<br>(512) 463-5650                              | Director of the Secretary of<br>State's Elections Division<br>who oversees responsibilities<br>outlined in Tex. Elec. Code §<br>31.001(b), § 31.004                            |
| Ruth Hughs, former Secretary<br>of State of Texas                   | 303 Colorado St., Suite 2000<br>Austin, TX 78701<br>(512) 495-6449                    | Former Secretary of State of<br>Texas. Knowledge related to<br>the administration of<br>elections in Texas, including<br>the smoothness and security<br>of the 2020 elections. |

- (2) A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

The text and legislative history of SB 1, which are publicly available online. Isabel Longoria is also in possession of documents related to the administration of elections in Harris County,

including documents related to mail-in voting and historical documents related to elections in Harris County. Isabel Longoria will supplement these disclosures as she receives additional documents in the future, such as guidance from the Texas Secretary of State.

- (3) **A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

Isabel Longoria is not seeking any damages.

- (4) **For inspection and copying as under Rule 34 any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Isabel Longoria does not have any responsive documents.

Dated November 5, 2021

Respectfully submitted,

/s/ Sameer S. Birring

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^ Application for admission to this court pending

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Capacity as Harris County Elections Administrator

**CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2021, the foregoing document was served via e-mail to all counsel of record.

/s/ Sameer S. Birring

Sameer S. Birring